

LAW OFFICES
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**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In re:

LOTUS EXIM INTERNATIONAL, INC.

Debtor.

Chapter 7

Case No.: 18-15957-VFP

**NOTICE OF APPEARANCE AND
REQUEST FOR SERVICE OF PAPERS**

PLEASE TAKE NOTICE that the undersigned hereby appears as counsel for Flushing Bank, which is a creditor and a party in interest in this bankruptcy case, and pursuant to, inter alia, Section 1109(b) of the Bankruptcy Code and Bankruptcy Rules 2002, 9001 and 9010, requests that all notices given or required to be given in this case, and all papers served or required to be served in this case, be given to and served upon the undersigned.

PLEASE TAKE FURTHER NOTICE that this request is a request not only for the notices and papers referred to in the Bankruptcy Rules specified above, but includes, without limitation, all orders and all notices of any application, motion, petition, pleading, request, complaint, or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, hand-delivery, telephone, facsimile transmission, telegraph, telex or otherwise.

PLEASE TAKE FURTHER NOTICE that Flushing Bank does not intend this Notice of Appearance and Demand for Service of Papers, nor any subsequent appearance, pleading, claim or suit to waive any rights to which Flushing Bank is entitled including, but not limited to, (i) Flushing Bank's right to have final orders in noncore matters entered only after de novo review by a District Judge, (ii) Flushing Bank's right to a trial by jury in any proceeding related to this case, (iii) Flushing Bank's right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (iv) any rights, claims, actions, defenses, setoffs, or recoupments to which Flushing Bank is or may be entitled under agreements, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments Flushing Bank expressly reserves.

LAW OFFICES OF CHARLES A. GRUEN
Attorneys for Creditor,
Flushing Bank

By: /s/ Rosa Amica-Terra

Dated: April 30, 2018